

Page 1		Page 2	
00:00:59	IN THE UNITED STATES DISTRICT COURT	00:00:59 1	Videotaped Deposition of MATT PAGE,
00:00:59	FOR THE SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION	00:00:59 2	Conducted Virtually;
00:00:59	-----x	00:00:59 3	
00:00:59	MENG HUANG, : Case No. 2:19-cv-1976	00:00:59 4	
00:00:59	Plaintiff, :	00:00:59 5	** ALL PARTIES ATTENDED REMOTELY **
00:00:59	-v- :	00:00:59 6	
00:00:59	THE OHIO STATE :	00:00:59 7	
00:00:59	UNIVERSITY AND GIORGIO :	00:00:59 8	
00:00:59	RIZZONI, :	00:00:59 9	Pursuant to Notice, before Pamela L. Beck,
00:00:59	Defendants. :	00:00:59 10	Court Reporter and Notary Public in and for the
00:00:59	-----x	00:00:59 11	Commonwealth of Pennsylvania.
00:00:59		12	
00:00:59	Videotaped Deposition of MATT PAGE	13	
00:00:59	Conducted Virtually	14	
00:00:59	Friday, January 15, 2021	15	
00:00:59	11:58 a.m. EST	16	
00:00:59		17	
00:00:59		18	
00:00:59		19	
00:00:59	Job No.: 345476C	20	
00:00:59	Pages: 1-39	21	
00:00:59	Reported by: Pamela L. Beck	22	
		23	
		24	
		25	
Page 3		Page 4	
00:00:59 1	A P P E A R A N C E S	00:00:59 1	C O N T E N T S
00:00:59 2	ON BEHALF OF PLAINTIFF:	00:00:59 2	EXAMINATION OF MATT PAGE PAGE
00:00:59 3	BRUCE C. FOX, ESQUIRE	00:00:59 3	By Mr. Fox 6
00:00:59 4	NOURHENE CHTOUROU, LAW CLERK	00:00:59 4	
00:00:59 5	OBERMAYER, REBMANN, MAXWELL AND HIPPEL,	00:00:59 5	
00:00:59 6	LLP	00:00:59 6	E X H I B I T S
00:00:59 7	515 William Penn Place	00:00:59 7	(Attached to transcript)
00:00:59 8	Suite 1710	00:00:59 8	M. PAGE DEPOSITION EXHIBIT PAGE
00:00:59 9	Pittsburgh, Pennsylvania 15219	00:00:59 9	Exhibit 182 Graduate Programs Handbook 18
00:00:59 10	(412) 566-1500	00:00:59 10	Exhibit 183 Section 7.6 of the Graduate 33
00:00:59 11	bruce.fox@obermayer.com	00:00:59 11	Student Handbook
00:00:59 12		00:00:59 12	
00:00:59 13	ON BEHALF OF DEFENDANTS:	13	
00:00:59 14	CHRISTINA L. CORL, ESQUIRE	14	
00:00:59 15	PLUNKETT COONEY	15	
00:00:59 16	300 East Broad Street	16	
00:00:59 17	590 suite	17	
00:00:59 18	Columbus, Ohio 43215	18	
00:00:59 19	(614) 629-3000	19	
00:00:59 20	ccorl@plunkettcooney.com	20	
00:00:59 21		21	
00:00:59 22	ALSO PRESENT:	22	
00:00:59 23	Ian Rowe, Videographer	23	
00:00:59 24	Jaime Leonard, AV Technician	24	
25		25	

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<p>00:00:59 1 PROCEEDINGS</p> <p>11:58:38 2 VIDEO OPERATOR: Here begins disk No. 1</p> <p>11:58:38 3 in the videotaped deposition of Matt Page in the</p> <p>11:58:38 4 matter of Meng Huang v Ohio State University and</p> <p>11:58:38 5 Giorgio Rizzoni in the United States District Court</p> <p>11:58:38 6 for the Southern District of Ohio, Eastern Division.</p> <p>11:58:38 7 Case No. 2:19-cv-1976.</p> <p>11:58:46 8 Today's date is January 15th, 2021. The</p> <p>11:59:05 9 time on the video monitor is 11:58 a.m. The</p> <p>11:59:10 10 videographer today is Ian Rowe representing Planet</p> <p>11:59:14 11 Depos. This video deposition is taking place</p> <p>11:59:17 12 remotely over Zoom.</p> <p>11:59:19 13 Would counsel please voice identify</p> <p>11:59:23 14 themselves and state whom they represent.</p> <p>11:59:24 15 MR. FOX: Yes. This is Bruce Fox on</p> <p>11:59:27 16 behalf of the Plaintiff Meng Huang.</p> <p>11:59:29 17 MS. CORL: Christina Corl for the</p> <p>11:59:31 18 Defendants.</p> <p>11:59:32 19 VIDEO OPERATOR: The court reporter today</p> <p>11:59:33 20 is Pam Beck representing Planet Depos. Would the</p> <p>11:59:38 21 reporter please swear in the witness.</p> <p>11:59:39 22 REPORTER: Will counsel please stipulate</p> <p>11:59:39 23 that in lieu of formally swearing in the witness,</p> <p>11:59:39 24 the reporter will instead ask the witness to</p> <p>11:59:39 25 acknowledge that their testimony will be true under</p>	<p>11:59:39 1 the penalties of perjury, that counsel will not</p> <p>11:59:39 2 object to the admissibility of the transcript based</p> <p>11:59:39 3 on proceeding in this way, and that the witness has</p> <p>11:59:39 4 verified that he is, in fact, Matt Page.</p> <p>11:59:39 5 Do all counsel agree?</p> <p>11:59:39 6 MR. FOX: I do.</p> <p>11:59:39 7 MS. CORL: Yes.</p> <p>11:59:39 8 REPORTER: Mr. Page, do you hereby</p> <p>11:59:39 9 acknowledge that your testimony will be true under</p> <p>11:59:39 10 the penalties of perjury?</p> <p>11:59:39 11 THE WITNESS: I do.</p> <p>11:59:39 12 MATT PAGE,</p> <p>11:59:39 13 the witness herein, was examined and</p> <p>11:59:39 14 testified under penalty of perjury as follows:</p> <p>11:59:39 15 EXAMINATION</p> <p>11:59:39 16 BY MR. FOX:</p> <p>12:00:20 17 Q Mr. Page, my name is Bruce Fox. As I</p> <p>12:00:23 18 told you, I represent the Plaintiff in this case. I</p> <p>12:00:26 19 just want to give you the ground rules for the</p> <p>12:00:28 20 deposition, but before I do that, let me ask you:</p> <p>12:00:34 21 Have you ever been deposed before?</p> <p>12:00:37 22 A I have.</p> <p>12:00:37 23 Q On how many occasions?</p> <p>12:00:39 24 A I believe twice.</p> <p>12:00:40 25 Q Okay. When do you recall you were</p>
Page 7	Page 8
<p>12:00:43 1 deposed?</p> <p>12:00:46 2 A I believe in 2016.</p> <p>12:00:51 3 Q Both depositions in 2016?</p> <p>12:00:54 4 A I believe so.</p> <p>12:00:57 5 Q What matter was it?</p> <p>12:01:03 6 A It was another lawsuit against the Ohio</p> <p>12:01:05 7 State University.</p> <p>12:01:08 8 Q What was the nature of the lawsuit?</p> <p>12:01:13 9 A It was a student conduct-related issue.</p> <p>12:01:18 10 Q Okay. What was the name of the student,</p> <p>12:01:21 11 if you recall?</p> <p>12:01:25 12 A The name of the student, I may get --</p> <p>12:01:33 13 MS. CORL: Wait a second, wait a second.</p> <p>12:01:34 14 If it's the case that I remember, that student was</p> <p>12:01:39 15 proceeding as a John Doe by Order of Court. And</p> <p>12:01:43 16 this witness is not going to violate any Court</p> <p>12:01:46 17 orders by revealing the name of the student.</p> <p>12:01:49 18 Was it a John Doe case?</p> <p>12:01:51 19 THE WITNESS: It was.</p> <p>12:01:53 20 MS. CORL: Matt, it was, wasn't it?</p> <p>12:01:55 21 THE WITNESS: It was, yes.</p> <p>12:01:56 22 MS. CORL: So it's a John Doe case, and</p> <p>12:01:58 23 this witness cannot reveal the name because there's</p> <p>12:02:01 24 a Court order.</p> <p>12:02:03 25 MR. FOX: Okay.</p>	<p>12:02:03 1 BY MR. FOX:</p> <p>12:02:04 2 Q It wasn't a case involving Dr. Strauss,</p> <p>12:02:07 3 was it?</p> <p>12:02:07 4 A No, no.</p> <p>12:02:08 5 Q Okay. Well, let me just review the</p> <p>12:02:10 6 ground rules for the deposition very briefly.</p> <p>12:02:14 7 They're very straightforward. I'll be asking you a</p> <p>12:02:18 8 series of questions today that are relevant to this</p> <p>12:02:20 9 case. And if any of my questions seem unclear to</p> <p>12:02:23 10 you or ambiguous in any way, just let me know that,</p> <p>12:02:28 11 and I'm happy to rephrase each question. Otherwise,</p> <p>12:02:30 12 I'm going to assume that you understand each</p> <p>12:02:33 13 question. Fair enough?</p> <p>12:02:34 14 A Yes.</p> <p>12:02:37 15 Q Also, if you would like to take a break</p> <p>12:02:39 16 at any point during the deposition, just let me</p> <p>12:02:41 17 know. I don't anticipate this is going to take very</p> <p>12:02:44 18 long at all, but if you do need to take a break, I'm</p> <p>12:02:47 19 happy to do it.</p> <p>12:02:48 20 It's also important to respond verbally.</p> <p>12:02:50 21 Even though we have a video, a videographer here and</p> <p>12:02:56 22 a video, we also have a written transcript. So I</p> <p>12:03:00 23 want to make sure that all of your responses are</p> <p>12:03:03 24 captured in the transcript. So a nod of the head or</p> <p>12:03:07 25 a shake of the head will not be captured.</p>

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<p>12:03:11 1 Also, you should try to make sure, if you</p> <p>12:03:14 2 could, that I've completed the question before you</p> <p>12:03:16 3 attempt to answer to prevent us from talking over</p> <p>12:03:21 4 each other and to allow the court reporter to take</p> <p>12:03:23 5 down the testimony accurately. Okay? Fair enough?</p> <p>12:03:26 6 A Okay.</p> <p>12:03:27 7 Q Okay. Do you understand that you're</p> <p>12:03:32 8 testifying here as a corporate designee on behalf of</p> <p>12:03:36 9 the University on specific matters that have been</p> <p>12:03:44 10 identified in the subpoena that was served on OSU?</p> <p>12:03:49 11 A I do.</p> <p>12:03:50 12 Q And what do you understand you're here to</p> <p>12:03:52 13 testify about, what categories?</p> <p>12:03:57 14 A I believe that I will be testifying about</p> <p>12:04:00 15 University policies and procedures regarding</p> <p>12:04:02 16 graduate education.</p> <p>12:04:08 17 Q Okay. And specifically regarding</p> <p>12:04:09 18 obtaining a Ph.D., is that correct?</p> <p>12:04:13 19 A Correct.</p> <p>12:04:14 20 Q And ultimately within the mechanical and</p> <p>12:04:18 21 aerospace engineering department of OSU, correct?</p> <p>12:04:23 22 A Correct.</p> <p>12:04:23 23 Q Okay. May I ask just very briefly for</p> <p>12:04:28 24 your educational background.</p> <p>12:04:31 25 A Yes. So I have a Bachelor's degree in</p>	<p>12:04:37 1 political science from the Pennsylvania State</p> <p>12:04:40 2 University. I have a Master's degree in education,</p> <p>12:04:45 3 leadership and policy analysis from the University</p> <p>12:04:47 4 of Wisconsin-Madison. And I have a Ph.D. in</p> <p>12:04:53 5 educational administration from the University of</p> <p>12:04:56 6 Texas in Austin.</p> <p>12:04:58 7 Q Okay. Can you describe briefly for me</p> <p>12:05:01 8 your employment history.</p> <p>12:05:04 9 A Yes. So since October of 2017, I have</p> <p>12:05:12 10 been an assistant dean in the graduate school here</p> <p>12:05:15 11 at Ohio State. Prior to that, in January of 2014, I</p> <p>12:05:22 12 began employment in the Student Conduct Office at</p> <p>12:05:25 13 Ohio State as an associate director. And then prior</p> <p>12:05:31 14 to that, I worked in the Student Contact Office at</p> <p>12:05:34 15 the University of Texas.</p> <p>12:05:41 16 Q Okay. Are you familiar with either of</p> <p>12:05:44 17 the individual parties in this case, either</p> <p>12:05:45 18 Ms. Huang or Professor Rizzoni? Do you know any of</p> <p>12:05:51 19 them personally?</p> <p>12:05:52 20 A I don't personally know either of them.</p> <p>12:05:54 21 Q Okay. You don't recall speaking with</p> <p>12:05:56 22 either one of them, correct?</p> <p>12:05:58 23 A Not that I recall.</p> <p>12:05:59 24 Q Okay. Now, what did you do to generally</p> <p>12:06:05 25 to prepare yourself to testify today on the</p>
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<p>12:06:08 1 designated categories?</p> <p>12:06:13 2 A Specifically for today, I carefully</p> <p>12:06:15 3 reviewed our graduate school handbook, which is our</p> <p>12:06:19 4 foundational documents that we use. And I also</p> <p>12:06:23 5 reviewed the 2015-2016 mechanical and aerospace</p> <p>12:06:30 6 engineering student handbook.</p> <p>12:06:33 7 Q Okay. Did you talk to anyone other than</p> <p>12:06:38 8 counsel for OSU in preparing for today?</p> <p>12:06:45 9 A I did not.</p> <p>12:06:46 10 Q Okay. And I take it you didn't review</p> <p>12:06:48 11 any email or any other documents in this case?</p> <p>12:06:52 12 A I did not.</p> <p>12:06:55 13 Q And I take it you did not review the</p> <p>12:06:56 14 Complaint that was filed by Plaintiff in this case?</p> <p>12:07:00 15 A I did not.</p> <p>12:07:04 16 Q How did you become aware of this</p> <p>12:07:06 17 litigation, in general?</p> <p>12:07:11 18 A When one of the individuals from our</p> <p>12:07:13 19 Office of Legal Affairs reached out to me to discuss</p> <p>12:07:17 20 the possibility of participating in a deposition.</p> <p>12:07:21 21 Q Okay. Before that, you were unaware?</p> <p>12:07:25 22 A That's correct, I don't remember learning</p> <p>12:07:26 23 about a lawsuit.</p> <p>12:07:34 24 Q Okay. Can you just -- just a general</p> <p>12:07:37 25 question, can you describe to me generally the</p>	<p>12:07:39 1 policies and procedures for obtaining a Ph.D. from</p> <p>12:07:47 2 OSU.</p> <p>12:07:48 3 A Yes. So our graduate school handbook</p> <p>12:07:52 4 lays out the minimum qualifications necessary for a</p> <p>12:07:56 5 student at the University to receive a Ph.D. degree.</p> <p>12:08:00 6 And it's the foundational requirements. So a</p> <p>12:08:05 7 program -- an individual academic program could not</p> <p>12:08:10 8 lessen those requirements, but they can add</p> <p>12:08:13 9 additional requirements to those based upon their</p> <p>12:08:15 10 own academic or professional needs.</p> <p>12:08:17 11 So for general, a student would need to</p> <p>12:08:23 12 complete 80 hours of graduate coursework, and then</p> <p>12:08:32 13 at least 50 of those, 5-0, must be beyond the</p> <p>12:08:37 14 Master's degree. The student must maintain a GPA of</p> <p>12:08:45 15 3.0 or higher in graduate credit work. The student</p> <p>12:08:53 16 must enroll in three graduate credit hours in each</p> <p>12:08:57 17 semester that they complete a candidacy exam, a</p> <p>12:09:04 18 final oral exam or graduate.</p> <p>12:09:05 19 The student must complete satisfactorily</p> <p>12:09:07 20 a candidacy exam. They must complete a final oral</p> <p>12:09:16 21 exam. They must complete a dissertation. They must</p> <p>12:09:20 22 adhere to all relevant application or graduation</p> <p>12:09:25 23 deadlines, and then complete any specific program</p> <p>12:09:30 24 requirements that they may add for their Ph.D.</p> <p>12:09:36 25 programs.</p>

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12:09:37 1 Q Okay. Are there specific program
 12:09:40 2 requirements for the mechanical and aerospace
 12:09:44 3 engineering department Ph.D. programs?
 12:09:47 4 A Yes. So I looked in their 15-16
 12:09:53 5 handbook, and besides the requirements that I just
 12:09:56 6 listed, they have specific requirements for
 12:10:00 7 enrollment in certain levels of classes. They
 12:10:03 8 require participation each semester in a seminar.
 12:10:07 9 And the program also has a qualifying examination,
 12:10:13 10 which is something that the grad school does not
 12:10:18 11 require, but programs are permitted to have.
 12:10:26 12 Q Is there a requirement that the students
 12:10:27 13 in the mechanical and aerospace engineering
 12:10:32 14 department take a particular number of credits per
 12:10:36 15 semester?
 12:10:43 16 A I don't recall seeing that in the
 12:10:44 17 handbook, the program handbook. But the grad school
 12:10:50 18 handbook does require enrollment in a certain number
 12:10:53 19 of credit hours per semester to maintain full-time
 12:10:58 20 status.
 12:10:59 21 Q Okay. Is there any prohibition upon a
 12:11:02 22 student taking classes outside the Ph.D. program
 12:11:09 23 that are of interest to them?
 12:11:10 24 A Not according to the graduate school
 12:11:13 25 handbook.

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12:11:14 1 Q Okay. Are there any other prohibitions,
 12:11:16 2 other than those deriving from the graduate school
 12:11:19 3 handbook?
 12:11:23 4 A I can't speak to all of the different
 12:11:25 5 programs that may have specific requirements. I
 12:11:29 6 think that some may and some may not.
 12:11:32 7 Q Okay. Do you know if Ph.D. students at
 12:11:45 8 OSU frequently take recreational classes outside of
 12:11:52 9 their discipline or field of study, such as dance or
 12:11:57 10 guitar lessons or things like that?
 12:12:00 11 A I can't speak to students in general. I
 12:12:03 12 believe that some may choose to take those if they
 12:12:06 13 have the ability to do so. I know that often
 12:12:10 14 students don't have that flexibility because they
 12:12:13 15 may already be taking courses for their major. And
 12:12:18 16 then if they're a GTA, they may have a high teaching
 12:12:23 17 load, so they may not have the ability, but some
 12:12:27 18 may.
 12:12:27 19 Q Okay. With respect to the mechanical and
 12:12:29 20 aerospace engineering department, how long does it
 12:12:36 21 usually take a Ph.D. student to complete their
 12:12:41 22 program?
 12:12:46 23 A I think it may vary depending upon the
 12:12:48 24 individual student. I saw in their handbook that
 12:12:51 25 they have specific requirements when the candidacy

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12:12:54 1 exam must be taken in relation to the qualifying
 12:12:58 2 examination. And the grad school has a requirement
 12:13:01 3 that a Ph.D. must be completed within five years of
 12:13:06 4 achieving candidacy.
 12:13:08 5 So I think typically at the University,
 12:13:12 6 students obtain a Ph.D. anywhere between four or
 12:13:16 7 seven years, four to seven years, that's the
 12:13:19 8 average.
 12:13:19 9 Q Okay. Let me ask you, can you describe
 12:13:26 10 for me what the candidacy exam represents. Just
 12:13:30 11 walk me through that.
 12:13:32 12 A Sure. So, again, every program is a
 12:13:38 13 little bit different in the way they structure that
 12:13:41 14 candidacy examination. But typically it is to
 12:13:44 15 demonstrate mastery of the content or subject matter
 12:13:49 16 for that program.
 12:13:50 17 In some programs, it may be a compilation
 12:13:57 18 of papers. In some, it may be discussing future or
 12:14:03 19 potential research for the dissertation. It just
 12:14:07 20 depends on that program. But candidacy exams do
 12:14:10 21 consist of two parts, a written exam and an oral
 12:14:13 22 examination.
 12:14:22 23 Q Okay. Are you generally familiar with
 12:14:26 24 policies governing whether or not a student who
 12:14:29 25 fails an initial candidacy exam can retake it?

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12:14:40 1 A I do know that our general handbook does
 12:14:44 2 discuss a supplemental candidacy exam, or a second
 12:14:49 3 attempt at a candidacy exam, if necessary.
 12:14:52 4 Q Okay. So is it correct that students are
 12:14:53 5 given the opportunity to retake the candidacy exam
 12:14:53 6 if they failed it the first time?
 12:14:57 7 A That's correct, students can be given an
 12:15:01 8 opportunity to do that.
 12:15:03 9 Q What is the rationale for that policy?
 12:15:09 10 A I think that the genesis -- and this is a
 12:15:12 11 policy that predates me. But I think that it's to
 12:15:15 12 offer flexibility for students that for whatever
 12:15:19 13 reason may not have had an opportunity to do as well
 12:15:23 14 as possible on the examination.
 12:15:24 15 Sometimes students may pass the written
 12:15:31 16 examination but not pass the oral examination. So
 12:15:33 17 the committee may decide that, maybe this wasn't a
 12:15:37 18 good day or they weren't prepared, so they'll give
 12:15:40 19 them an opportunity to do it again.
 12:15:45 20 Q Are you aware of any circumstances where
 12:15:46 21 a student in any Ph.D. program at OSU has been
 12:15:52 22 denied the opportunity to retake the candidacy exam
 12:15:55 23 after failing it the first time?
 12:16:02 24 A I can't think of any specific examples
 12:16:05 25 off the top of my head.

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12:16:06 1 Q Okay. And you're certainly not aware of
 12:16:10 2 any specific examples in the mechanical and
 12:16:13 3 aerospace engineering program, correct?
 12:16:19 4 A Not that I can think of.
 12:16:22 5 Q Okay. Were you aware -- are you aware
 12:16:25 6 that in this case, Ms. Huang was denied the
 12:16:29 7 opportunity to retake her candidacy exam? Are you
 12:16:40 8 aware of that is my question?
 12:16:43 9 MS. CORL: Objection. That's not true.
 12:16:44 10 She did retake her candidacy exam, so it assumes
 12:16:49 11 facts not in evidence. You can answer.
 12:16:53 12 Q Let me restate the question, then.
 12:16:56 13 Or you aware or were you aware at any
 12:16:58 14 time that Ms. Huang's Ph.D. advisor, Professor
 12:17:05 15 Rizzoni, after he failed her on her initial exam, he
 12:17:09 16 told her she could not take it again?
 12:17:12 17 MS. CORL: Objection. Again, assumes
 12:17:17 18 facts not in evidence. That's not true, but you can
 12:17:22 19 answer.
 12:17:23 20 A Not that I recall.
 12:17:23 21 Q Okay. So what I'd like to do is have you
 12:17:34 22 take a look at Exhibit 182.
 12:17:44 23 MR. FOX: If the technician could put
 12:17:46 24 that up, please.
 12:17:49 25 AV TECHNICIAN: Please stand by.

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12:17:49 1 (Exhibit 182 was marked for
 12:17:49 2 identification.)
 12:17:49 3 BY MR. FOX:
 12:18:08 4 Q From the first page of the document,
 12:18:09 5 Mr. Page, can you identify what this document
 12:18:13 6 appears to be.
 12:18:15 7 A Yes. This appears to be the Mechanical
 12:18:17 8 Engineering and Aeronautical and Astronautical
 12:18:21 9 Engineering Graduate Programs Handbook, the
 12:18:25 10 2015-2016 edition.
 12:18:31 11 Q Okay. Is this one of the documents you
 12:18:34 12 reviewed in preparation for this deposition today?
 12:18:36 13 A Yes, it is.
 12:18:37 14 Q If we could turn to page 18, please,
 12:18:45 15 which is OSU_214. I'd like you to turn your
 12:18:53 16 attention to the provision of the document entitled
 12:19:00 17 V.4 Candidacy Examination.
 12:19:04 18 Do you see that?
 12:19:06 19 A I do.
 12:19:13 20 Q Does that set forth an explanation of the
 12:19:21 21 candidacy examination process?
 12:19:27 22 A It appears to from the program
 12:19:29 23 perspective.
 12:19:32 24 Q Okay. Does it indicate that students in
 12:19:40 25 the Ph.D. program are permitted to take the

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12:19:46 1 candidacy examination twice if they fail the first
 12:19:50 2 time?
 12:19:53 3 MS. CORL: Objection. This document
 12:19:54 4 speaks for itself. You can answer.
 12:20:01 5 A I'm sorry, would you repeat the question.
 12:20:04 6 Q Yeah. Is it your understanding of this
 12:20:06 7 policy, that it requires the University to allow
 12:20:11 8 students who fail their exam the first time to be
 12:20:15 9 given a second chance?
 12:20:20 10 MS. CORL: Same objection. You can
 12:20:21 11 answer.
 12:20:22 12 A It does talk about students are not
 12:20:24 13 permitted to take it more than twice, then the
 12:20:50 14 timing -- yeah, so it looks like the timing and that
 12:20:52 15 they are not permitted to take it more than twice.
 12:20:55 16 Q Okay. And then the next paragraph is
 12:21:01 17 entitled Candidacy Examination/Doctoral Committee.
 12:21:06 18 MR. FOX: If we could scroll down just a
 12:21:09 19 little bit, Ms. Technician, so we can see the whole
 12:21:15 20 paragraph. Okay. Thank you.
 12:21:26 21 Q Just take a look at this paragraph. I
 12:21:28 22 won't read it to you, but I'll ask you what it
 12:21:31 23 refers to.
 12:21:42 24 A This section is specifically referencing
 12:21:43 25 the composition of the committee for the

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12:21:49 1 examination.
 12:21:49 2 Q Okay. And it describes the policy for
 12:21:55 3 the selection process for members of the candidacy
 12:22:00 4 examination committee, correct?
 12:22:02 5 A Correct.
 12:22:15 6 Q If you could turn, then, to the next
 12:22:17 7 paragraph, paragraph 6, which is entitled Changing
 12:22:23 8 the Members of your Candidacy Examination Committee.
 12:22:32 9 Without reading that paragraph, what is
 12:22:34 10 the purpose of paragraph 6?
 12:22:41 11 A This paragraph references how a potential
 12:22:44 12 change to the committee may occur.
 12:22:51 13 Q Okay. And then paragraph 7, the next
 12:22:56 14 paragraph, is entitled Adding External (Non-OSU
 12:22:58 15 Faculty Members) to your Doctoral Committee.
 12:23:03 16 Do you see that?
 12:23:04 17 A I do.
 12:23:08 18 Q Does that identify the policies governing
 12:23:11 19 how a non-OSU faculty member can be added to a
 12:23:17 20 doctoral committee?
 12:23:18 21 A It does.
 12:23:18 22 Q Okay. And then there are further
 12:23:37 23 provisions in here, in this document addressing
 12:23:40 24 second-time candidacy examinations, is that correct?
 12:23:47 25 MS. CORL: Objection. Do you want him to

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12:23:49 1 review this whole document, or do you want to direct
 12:23:51 2 him to what you're talking about?
 12:23:54 3 MR. FOX: Yeah, I can do that counsel.
 12:23:57 4 Q Let's go to paragraph V.10, for example,
 12:24:00 5 entitled --
 12:24:02 6 MR. FOX: If you can scroll down a little
 12:24:04 7 bit.
 12:24:04 8 Q -- oral Portion of the Candidacy
 12:24:07 9 Examination. If we could look at numbered paragraph
 12:24:19 10 1, which reads -- do you see that? The written
 12:24:23 11 portion of the candidacy examination, which
 12:24:25 12 necessarily includes the dissertation proposal, must
 12:24:29 13 be graded by the dissertation committee. For
 12:24:33 14 second-time candidacy examinations, the dissertation
 12:24:36 15 proposal must be graded by the dissertation
 12:24:39 16 committee before being sent to the graduate faculty
 12:24:40 17 representative.
 12:24:43 18 Do you see that provision referring to
 12:24:45 19 second-time candidacy examinations?
 12:24:47 20 A Yes, I see that provision.
 12:24:56 21 Q Let me ask you generally: In the process
 12:25:01 22 leading up to the candidacy exam, who generally
 12:25:04 23 decides when it's appropriate for the student to
 12:25:08 24 take the candidacy exam?
 12:25:14 25 A I think it depends a little bit upon each

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12:25:17 1 individual program. But in general, it would be the
 12:25:21 2 student's advisor and the graduate studies committee
 12:25:27 3 of the program.
 12:25:29 4 Q Okay. What are the prerequisites to
 12:25:32 5 making that determination, that the student is ready
 12:25:36 6 for the candidacy exam?
 12:25:38 7 A Again, I think it depends on the program.
 12:25:41 8 But typically it would be a conversation with the
 12:25:47 9 student, a review of the student's academic progress
 12:25:51 10 up to that point, the completion of requirements for
 12:25:55 11 the graduate school and the program. Those are
 12:26:01 12 typically the main metrics I would say.
 12:26:05 13 Q Okay. Now, is the written portion of the
 12:26:14 14 candidacy exam graded by the dissertation committee?
 12:26:26 15 A When you say the dissertation committee,
 12:26:30 16 are you referring to the candidacy committee?
 12:26:34 17 Q Actually, there are two committees,
 12:26:36 18 correct, the dissertation committee and the
 12:26:40 19 candidacy committee?
 12:26:41 20 A It depends. So in some programs, it may
 12:26:44 21 be the same, and in some programs, it may be a
 12:26:48 22 different composition.
 12:26:51 23 Q What is the case in the mechanical and
 12:26:55 24 aerospace engineering department?
 12:27:03 25 A I believe that this handbook does

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12:27:05 1 specifically reference that, that it's the same
 12:27:08 2 committee membership.
 12:27:10 3 Q Okay. So let me just ask you, then, in
 12:27:16 4 this way: Do the members of the candidacy exam
 12:27:20 5 committee grade the candidates' dissertation
 12:27:34 6 proposal?
 12:27:34 7 A Would you clarify the dissertation
 12:27:36 8 proposal. Are you saying the candidacy examination
 12:27:39 9 or --
 12:27:40 10 Q Do the candidates provide proposals as to
 12:27:47 11 what they'll present in their candidacy exam?
 12:27:53 12 A I think it depends on the program itself
 12:27:55 13 and what the requirements are.
 12:28:00 14 Q Okay. Do you know if it's required by
 12:28:10 15 the mechanical and aerospace engineering department?
 12:28:22 16 A I don't recall reading that specifically
 12:28:28 17 in this handbook.
 12:28:31 18 Q Okay. Well, let me ask you this: What
 12:28:44 19 constitutes the written portion of the candidacy
 12:28:46 20 exam?
 12:28:51 21 A It varies depending upon the program.
 12:28:54 22 Some programs will maybe have a preset selection of
 12:28:57 23 questions or topics to provide to the student. Some
 12:29:02 24 programs may just work with the student to determine
 12:29:05 25 the nature or the content of the written

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12:29:08 1 examination. It would be dependent upon their own
 12:29:12 2 policies and practices I think.
 12:29:19 3 Q If we could turn to paragraph 1, which is
 12:29:22 4 up on the page. It reads: The written portion of
 12:29:26 5 the candidacy exam, which necessarily includes the
 12:29:30 6 dissertation proposal, must be graded by the
 12:29:35 7 dissertation committee.
 12:29:37 8 Do you see that?
 12:29:40 9 A Yes.
 12:29:40 10 Q Does that identify the policy in place of
 12:29:45 11 the mechanical engineering department -- I'm sorry,
 12:29:48 12 the mechanical and aerospace engineering department?
 12:29:56 13 A Are you asking in terms of the
 12:29:58 14 composition of the candidacy exam?
 12:30:00 15 Q Yes.
 12:30:06 16 A It does state that it includes a
 12:30:08 17 dissertation proposal.
 12:30:11 18 Q And that dissertation proposal is graded
 12:30:15 19 by the dissertation committee, correct?
 12:30:19 20 A That's what that sentence says, yes.
 12:30:21 21 Q And then it says: For second-time
 12:30:22 22 candidacy examinations, the dissertation proposal
 12:30:27 23 must be graded by the dissertation committee before
 12:30:30 24 being sent to the graduate faculty representative,
 12:30:34 25 correct?

12:30:36 1 A Yes, that's what it says.
 12:30:40 2 Q Okay. Is the dissertation proposal alone
 12:30:57 3 sufficient to fulfill the written requirements of
 12:31:01 4 the candidacy exam? Again, we're talking about MAE.
 12:31:09 5 A I can't speak to that. I think that that
 12:31:12 6 would be a program determination.
 12:31:20 7 Q Okay. Do you have any sense of the
 12:31:33 8 degree to which Ph.D. students failed their first
 12:31:40 9 MAE exam?
 12:31:46 10 A Are you asking in terms of percentages
 12:31:48 11 or --
 12:31:49 12 Q Sure.
 12:31:52 13 A I don't know the answer to that question.
 12:31:55 14 Q Or any other metric other than
 12:31:58 15 percentages?
 12:32:01 16 A No, I don't know any specific numbers
 12:32:08 17 unfortunately.
 12:32:08 18 Q Okay. But it's not -- you would agree
 12:32:11 19 it's not uncommon for Ph.D. students to fail their
 12:32:16 20 initial candidacy exam?
 12:32:18 21 A That's correct, there are students that
 12:32:20 22 do not successfully complete their candidacy exams.
 12:32:28 23 Q Okay. Just some questions about the
 12:32:29 24 candidacy examination committee. How many committee
 12:32:33 25 members usually participate in the candidacy exam?

12:32:41 1 A Our grad school handbook requires four.
 12:32:45 2 Q Who determines the composition of the
 12:32:51 3 candidacy committee?
 12:32:52 4 A I think, again, it depends upon the
 12:32:55 5 individual program. But it's typically the
 12:32:58 6 student's advisor and the graduate studies committee
 12:33:06 7 working in conjunction with the student.
 12:33:10 8 Q Okay. Is the expectation that the
 12:33:15 9 student will be given -- will be able to participate
 12:33:20 10 in the process of selecting their candidacy exam
 12:33:23 11 members in a meaningful way?
 12:33:30 12 A When you say expectation, are you
 12:33:32 13 referring to the graduate school or the program?
 12:33:35 14 Q The expectation of the graduate school
 12:33:39 15 program, and the expectation of all parties involved
 12:33:44 16 in the process?
 12:33:47 17 A Yeah, I believe that the hope would be
 12:33:51 18 that it would be a collective conversation and
 12:33:55 19 agreement, that all members would be able to agree
 12:33:59 20 on the composition of the committee that they think
 12:34:01 21 would be best moving forward based upon the
 12:34:05 22 student's knowledge, the topic of their research,
 12:34:09 23 those sorts of things.
 12:34:13 24 Q Okay. Once candidacy committee members
 12:34:19 25 are selected, who can change the committee members,

12:34:27 1 or does that even typically happen?
 12:34:33 2 A I think that it does on occasion, a
 12:34:35 3 committee may change. Sometimes faculty members
 12:34:39 4 leave the University. Sometimes maybe a committee
 12:34:46 5 has identified someone that maybe has additional
 12:34:50 6 knowledge or experience that may be helpful, so it
 12:34:53 7 does occur.
 12:34:54 8 Q Okay. In the case of the department of
 12:34:58 9 mechanical and aerospace engineering, how many
 12:35:05 10 candidacy exam committee members should be from that
 12:35:11 11 department?
 12:35:17 12 A I don't recall the exact number, but it
 12:35:19 13 may be within this document.
 12:35:26 14 Q Do you recall whether it requires half of
 12:35:28 15 them to be members of the department, at least half?
 12:35:36 16 A I don't recall, but it may be in this
 12:35:37 17 document.
 12:35:46 18 MS. CORL: We're happy to have the
 12:35:48 19 witness review the document so he can --
 12:35:52 20 Q Yeah, why don't you take a moment --
 12:35:54 21 you've reviewed the document, that's a good idea
 12:35:58 22 actually. You're familiar with it presumably. Can
 12:35:59 23 you identify that in there.
 12:36:04 24 MS. CORL: Take your time, Matt, and just
 12:36:06 25 look and see if you can find anything on the topic

12:36:09 1 he's asking.
 12:36:39 2 A Yeah, so section VI.5, it does state at
 12:36:42 3 least half of the members of the candidacy
 12:36:45 4 examination committee should be from the department
 12:36:47 5 of mechanical and aerospace engineering.
 12:36:49 6 Q I'm sorry, what page is that?
 12:36:55 7 A It is -- sorry, just one moment. Page
 12:36:58 8 27, VI.5.
 12:37:02 9 Q Okay. Thank you. If we could look on
 12:37:20 10 the same page under the heading candidacy
 12:37:24 11 examination, I just want to direct your attention to
 12:37:40 12 the first portion of that, which states: The
 12:37:42 13 candidacy examination is a single examination
 12:37:45 14 consisting of a written portion and an oral portion.
 12:37:48 15 The objective of this examination is to test the
 12:37:51 16 student's knowledge of the field and related areas
 12:37:55 17 of study, capacity to undertake independent
 12:37:59 18 research and ability to think and express ideas
 12:38:03 19 clearly.
 12:38:07 20 Does that correctly -- does that
 12:38:09 21 correctly state the policy of the University as to
 12:38:14 22 the intention of the candidacy examination?
 12:38:17 23 MS. CORL: Can we please get on the
 12:38:19 24 screen whatever you're reading from.
 12:38:24 25 MR. FOX: Oh, I thought we had it up.

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12:38:25 1 I'm sorry. Let's go to the very top of the page,
 12:38:29 2 27. Let me reread it, then, just for the benefit of
 12:38:41 3 the witness.
 12:38:42 4 Q The candidacy examination is a single
 12:38:42 5 examination consisting of a written portion and an
 12:38:42 6 oral portion. The objective of this examination is
 12:38:42 7 to test the student's knowledge of the field and
 12:38:42 8 related areas of study, capacity to undertaken
 12:38:42 9 independent research and ability to think and
 12:38:42 10 express ideas clearly.
 12:39:01 11 Does that, based upon your understanding,
 12:39:07 12 recite the policy of the University as to the
 12:39:11 13 purpose of the candidacy examination?
 12:39:23 14 MS. CORL: I'm going to object to the
 12:39:24 15 form of the question. You can answer it.
 12:39:30 16 A So I believe that some of the things that
 12:39:32 17 are referenced here do speak in general to the
 12:39:36 18 expectation of the purpose of a candidacy
 12:39:39 19 examination.
 12:39:42 20 Q Okay. And then that paragraph concludes
 12:39:45 21 with the statement: In addition, no student is
 12:39:50 22 permitted to take the candidacy examination more
 12:39:52 23 than twice, correct?
 12:39:56 24 A Correct.
 12:39:58 25 Q So does that further confirm your

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12:40:00 1 understanding that the student who fails his exam
 12:40:04 2 the first time is permitted to take it a second
 12:40:06 3 time?
 12:40:09 4 MS. CORL: Objection. Assumes facts not
 12:40:14 5 in evidence and mischaracterizes his testimony.
 12:40:16 6 A That sentence doesn't specifically state
 12:40:18 7 it, state it that way. But it does say that a
 12:40:23 8 student is permitted -- is not permitted to take it
 12:40:26 9 more than twice.
 12:40:30 10 Q Okay. So is it, therefore, your
 12:40:33 11 understanding that a student is permitted to retake
 12:40:35 12 the exam after failing it the first time, is given
 12:40:40 13 the opportunity to take it the second time, but
 12:40:43 14 cannot take it more than two times?
 12:40:45 15 MS. CORL: You can answer. Same
 12:40:47 16 objection. That's not what this says, and it
 12:40:50 17 misstates this witness' testimony.
 12:40:52 18 MR. FOX: I'm asking for this witness'
 12:40:54 19 understanding of the policy.
 12:40:55 20 Q Is that the policy --
 12:40:57 21 MS. CORL: You can answer.
 12:40:58 22 Q -- Mr. Page, as you understand it?
 12:41:01 23 MS. CORL: You've asked him this multiple
 12:41:03 24 times. Same objection.
 12:41:06 25 A Yes, this doesn't specifically state that

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12:41:08 1 students are permitted two attempts. But it says
 12:41:12 2 that no student is permitted to take it more than
 12:41:15 3 twice.
 12:41:16 4 Q Okay. Based upon your experience and
 12:41:18 5 your position with the University, is it your
 12:41:21 6 understanding that the students are permitted to
 12:41:23 7 retake the exam after the first attempt if they fail
 12:41:26 8 the first time?
 12:41:30 9 A Yes, our graduate school handbook does
 12:41:33 10 state that students are permitted to have a second
 12:41:35 11 attempt.
 12:41:40 12 Q Okay. Do you have any knowledge of how
 12:41:53 13 many students at the MAE department may have failed
 12:42:00 14 the candidacy exam in the past?
 12:42:09 15 A I do not.
 12:42:23 16 Q Just bear with me a moment. So is it
 12:42:49 17 correct what you just said, that if a professor
 12:42:55 18 attempted to prohibit a student from taking the exam
 12:43:00 19 after failing it the first time, that would be a
 12:43:02 20 violation of University policy, correct?
 12:43:07 21 MS. CORL: Same objection. You can
 12:43:08 22 answer. Objection, mischaracterizes testimony, and
 12:43:12 23 there is no such University policy. You can answer.
 12:43:16 24 A The grad school handbook does speak to
 12:43:22 25 second attempts, but I don't believe that it

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12:43:26 1 references that.
 12:43:35 2 MR. FOX: Why don't we take a short
 12:43:36 3 break. I may be completed with my questioning. Let
 12:43:40 4 me just take a moment and go off the record.
 12:43:45 5 VIDEO OPERATOR: The time is 12:43 p.m.
 12:43:47 6 We are now off the record.
 12:43:48 7 (Whereupon, there was a recess in the
 12:43:48 8 proceedings.)
 12:45:47 9 VIDEO OPERATOR: The time is 12:45 p.m.
 12:45:53 10 We are back on the record.
 12:45:53 11 BY MR. FOX:
 12:45:55 12 Q Just to follow up to your previous
 12:45:58 13 answer. You testified there's a provision in the
 12:46:02 14 graduate student handbook permitting two candidacy
 12:46:09 15 exams. Do you have that handy, that -- you
 12:46:12 16 indicated you reviewed that document. Can you
 12:46:14 17 identify the provision in the handbook?
 12:46:17 18 A Yes. Do you have a copy as well?
 12:46:23 19 Q Yes.
 12:46:30 20 A One moment, please.
 12:46:33 21 Q Sure.
 12:47:07 22 A It is in section 7.6.4.
 12:47:13 23 Q And what page is that?
 12:47:17 24 A Unfortunately it's a web-based version,
 12:47:19 25 there is no page number.

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12:47:21 1 Q Okay.

12:47:23 2 A But it's section 7.6.4.

12:47:31 3 Q Okay.

12:47:31 4 MR. FOX: Why don't we just take a moment

12:47:34 5 so we can email that to the technician, just so that

12:47:36 6 we can then verify that. And then I think that's

12:47:38 7 all I'll have. If we could just take a moment.

12:47:53 8 VIDEO OPERATOR: The time is 12:47 p.m.

12:47:55 9 We are off the record.

12:47:56 10 (Whereupon, there was a recess in the

12:47:56 11 proceedings.)

12:51:13 12 VIDEO OPERATOR: The time is 12:50 p.m.

12:51:15 13 We are back on the record.

12:51:28 14 MR. FOX: So, if we would -- once we get

12:51:32 15 the screen up, if we could give Mr. Page access to

12:51:36 16 the screen, I would just ask him if he could scroll

12:51:40 17 through to the section that he cited in his

12:51:41 18 testimony, section 7.6.4 I believe it was.

12:51:49 19 AV TECHNICIAN: Counsel, since you are

12:51:51 20 sharing the screen, you will have to grant the

12:51:53 21 witness permission to control the screen, if that's

12:51:59 22 what you intend to do, which is located at the top.

12:52:03 23 (Exhibit 183 was marked for

12:52:03 24 identification.)

12:52:03 25 BY MR. FOX:

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12:52:33 1 Q Is that the section that you were

12:52:35 2 referring to, Mr. Page, entitled Second Candidacy

12:52:38 3 Exam?

12:52:38 4 A It is.

12:52:42 5 Q Could you kindly read it into the record,

12:52:45 6 please.

12:52:45 7 A Read the section?

12:52:47 8 Q Yes, if you don't mind.

12:52:54 9 A So this is section 7.6.4, Second

12:52:57 10 Candidacy Examination. The nature of the second

12:53:00 11 candidacy examination is determined by the candidacy

12:53:04 12 examination committee. Normally the second exam

12:53:06 13 will include both a written and an oral portion. In

12:53:10 14 cases where the student's performance on the first

12:53:13 15 written exam was of such a high caliber that the

12:53:18 16 exam committee does not request any rewrites, then

12:53:22 17 only the oral portion needs to be repeated.

12:53:24 18 The advisor should indicate on the report

12:53:26 19 on candidacy examination, that's a typo, it should

12:53:32 20 be for, from the first attempt that a new written

12:53:35 21 exam will not be required for the second attempt.

12:53:37 22 If any portion of the first written exam was not

12:53:40 23 satisfactory, the exam committee must administer a

12:53:45 24 second written exam. A second oral exam will always

12:53:48 25 be required.

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12:53:50 1 The candidacy examination committee for a

12:53:52 2 second exam must be the same as the committee for

12:53:56 3 the first attempt, unless a substitution is approved

12:54:00 4 by the graduate school. The second candidacy

12:54:04 5 examination must be completed no later than one

12:54:06 6 autumn or spring semester or summer term before

12:54:10 7 graduation. All other rules pertaining to candidacy

12:54:13 8 exams must be followed.

12:54:18 9 Q And that is the policy governing the

12:54:20 10 second candidacy exam, correct?

12:54:22 11 A That's correct. And it follows the two

12:54:26 12 items just above that as well.

12:54:36 13 Q Okay.

12:54:38 14 MR. FOX: Can you scroll up.

12:54:45 15 Q So what numbers are you referring to?

12:54:47 16 A I'm sorry, if you could go back down.

12:54:50 17 It's still section 7.6.

12:54:53 18 Q Okay.

12:54:54 19 A So, in 7.6.1, that references the

12:54:58 20 decision, the committee's decision about the student

12:55:04 21 candidacy examination. And if it's a unanimous

12:55:08 22 satisfactory, then the student completes the

12:55:11 23 examination. However, if it's judged

12:55:14 24 unsatisfactory, 7.6.3 talks about the candidacy exam

12:55:21 25 committee must determine whether or not the student

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12:55:24 1 will be permitted to give a second candidacy exam.

12:55:27 2 If they do, then that follows into 7.6.4, the nature

12:55:32 3 of the second candidacy exam.

12:55:34 4 Q I see. But it's your understanding that

12:55:45 5 the students are almost always permitted to take the

12:55:48 6 candidacy the second time if they fail it the first

12:55:53 7 time?

12:55:54 8 MS. CORL: Objection. Mischaracterizes

12:55:56 9 his testimony and calls for speculation. You can

12:55:59 10 answer.

12:55:59 11 A If you look at 7.6.3, it states that the

12:56:03 12 candidacy exam committee decides whether a student

12:56:07 13 will be permitted for a second attempt, and then

12:56:10 14 they record that decision.

12:56:14 15 Q Okay. Yeah, and my only question is:

12:56:17 16 Isn't it almost always the case that the student is

12:56:21 17 given a chance to take the exam a second time, given

12:56:26 18 a second chance?

12:56:28 19 MS. CORL: Same objection.

12:56:28 20 A I can't speak to every situation, but

12:56:31 21 some students are permitted for a second attempt.

12:56:34 22 And there may be circumstances where a student is

12:56:37 23 not based on their performance.

12:56:40 24 Q Okay. And are you aware of any

12:56:43 25 circumstances where they were not based upon their

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12:56:45 1 performance?

12:56:50 2 A None that I can specifically think of off

12:56:51 3 the top of my head.

12:56:53 4 MR. FOX: Okay. All right. Those are

12:56:54 5 all the questions I have. Thank you very much,

12:56:57 6 Mr. Page. I appreciate you attending and hope you

12:57:01 7 have a nice afternoon.

12:57:03 8 THE WITNESS: Thank you. You too.

12:57:05 9 MS. CORL: He'll read.

12:57:08 10 VIDEO OPERATOR: The time is 12:56 p.m.

12:57:11 11 This marks the end of the deposition of Matt Page.

12:57:14 12 We are going off the record.

12:57:14 13 (Off the record at 12:56 p.m.)

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1 ACKNOWLEDGMENT OF DEPONENT

2 I, MATT PAGE, do hereby acknowledge that I

3 have read and examined the foregoing testimony, and

4 the same is a true, correct and complete

5 transcription of the testimony given by me, and any

6 corrections appear on the attached Errata Sheet

7 signed by me.

8

9

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11 _____

12 (DATE) (SIGNATURE)

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1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2

3 I, Pamela L. Beck, the officer before whom the

4 foregoing proceedings were taken, do hereby certify

5 that the foregoing transcript is a true and correct

6 record of the proceedings; that said proceedings

7 were taken by me stenographically, and thereafter

8 reduced to typewriting under my supervision; and

9 that I am neither counsel for, related to, nor

10 employed by any of the parties to this case, and

11 have no interest, financial or otherwise, in its

12 outcome.

13 IN WITNESS WHEREOF, I have hereunto set my hand

14 and affixed my notarial seal this 27th day of

15 January.

16

17

18 My commission expires January 14, 2023.

19

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21

22

23 _____

24 NOTARY PUBLIC IN AND FOR THE

25 COMMONWEALTH OF PENNSYLVANIA